DRUG STANDARDS WITH REFERENCE TO THE PURE FOOD AND DRUG LAW.

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THE enactment of the pure food and drug law has brought to the front, as was expected, many important facts regarding the question of standards. In the first place, the United States Pharmacopœia has become of the greatest importance, inasmuch as the law requires that the standards for drugs and medicines shall be based upon that authority. The United States Pharmacopœia will have, therefore, far greater authority than heretofore. The National Formulary is also mentioned as a standard; but this standard work, which is far inferior to that of the pharmacopœia, is of much more recent creation.

The framers of the law, it would seem, were not familiar with two important facts concerning these two national standards. The law seems to indicate that the pharmacopœia has a test for all of the remedial agents mentioned; and the law also indicates that the National Formulary has standards for preparations it recognizes. Now, the facts are the United States Pharmacopœia does not prescribe tests for over fifty per cent. of the preparations it authorizes; and the National Formulary prescribes practically no tests whatever for assaying its preparations; therefore, the question of standards becomes a very important one.

It is said the pharmacopœia has been found, since the enactment of the pure food and drug law, to have standards and processes of assaying which in some cases should be amended. The manufacturers of chemicals and remedial agents have been greatly excited over this question. They have pointed out some errors of a minor character, it is true, some of them being plainly errors of figures, melting- and boiling-points, etc., which should be revised. It is plain that the committee of revision will be obliged to take up the question of correcting any errors and defective tests, and a supplement to the pharmacopœia will have to be issued. The work before the committee of revision will take some time, but it is to be hoped that the standards will be as high as they have thus far been prescribed, while at the same time there will be no injustice to the manufacturing industry nor to the consumer in making the few revisions proposed. It has been stated that there are a few tests in the pharmacopœia which are needlessly rigid. Undoubt-

edly this question will be considered, and in due time reported upon.

It should be stated in this connection that methods of assay or examination should be agreed upon for preparations of the United States Pharmacopœia and National Formulary, for which there are no prescribed tests.

Take, for example, the fluid extract of taraxacum. It is well known that there is upon the market an article which is sold as the American dandelion, and this is known to have been sold for taraxacum. The question occurs, How shall we assay the fluid extract of taraxacum to ascertain whether it has been adulterated with fluid extract of chicory? There is a method known to the pharmacist, but this is not mentioned in the pharmacopœia, nor have any tests been agreed upon for the purpose of standardizing such a preparation. Take another example, where we have the fluid extract of columbo. This has been adulterated with what has been known as American columbo, but there has been no prescribed method of assay or examination recognized in the pharmacopœia. The expert pharmacist is able to detect the presence of American columbo, but, as I have stated, no recognized method of examination has been adopted. It seems to us that cases of this kind will have to be seriously considered if we are to make the National Formulary and the United States Pharmacopœia effective as is intended by the pure food and drug law.

It is unfortunate that there should exist any ambiguities or misunderstandings as to standards, but this seems at the present stage inevitable. Still, it is quite possible for the pharmacist to take care of the medicinal preparations for which there is no test provided, by employing tests known to himself. This will have to be done until a uniform process of examinations of such medicinal preparations is agreed upon.

Some of our large manufacturers are very much exercised as regards the retroactive character of the law, which seems to be one of its features.

It is to be hoped that the manufacturers will find that they have overestimated the difficulties in view of the retroactiveness of the law. Under the guidance of such a man as Doctor Wiley, we feel, while the law will be rigidly enforced, the spirit rather than the letter will be made the principal feature; and if this is to be the policy, it seems to us that we shall not have any clamor on the part of manufacturers and wholesalers against it from this point of view. It is unquestionably true that manufacturers have shown not only

a willingness, but an earnest desire to comply with all the provisions laid down in the law itself, and are willing to cooperate in every possible way in making the same effective and practical in its operation.

In a current issue of one of the pharmaceutical journals, it refers to the law in these words: "Don't worry over the pure food and drug act of 1906, unless you sell goods in some state other than the one in which you live. Every article which you have in your stock January 1, 1907, may be sold to your home trade without restriction, and all articles which you receive after January 1, will be pure and will conform to the new law, and you will be held harmless under its operations, provided you purchase your supplies from a reputable house whose guaranty is registered at Washington." It further states that "we will guarantee that all articles of food or drugs manufactured, packed, distributed or sold by us, including both food and powdered drugs, chemicals, pharmaceutical preparations, medicinal specialties, proprietary medicines, etc., are not misbranded within the meaning of said act."

Few members of the community realize what an immense amount of work will be required for the manufacturer and wholesale dealer to comply with section 8 of the law relating to labeling by the time specified. The major part of the work on the part of the manufacturer and dealer lies in the direction of taking care of the stock which is already distributed among wholesale dealers and jobbers. Some are inclined to make the statement that if the law be rigidly enforced as to these already distributed goods it will be practically inoperative because of the difficulty of carrying out its provisions.

One firm has made the statement that it will require 100 extra men from this time on to go over the stock that is now distributed in the wholesale market, stored away in original packages, which will have to be opened and repacked, to say nothing of the goods that they are obliged to put out between now and January 1, if obliged to distribute them as they have been accustomed to do, for the reason that it will take them at least a month or more to readjust their different departments to comply with the law in connection with the goods that will be shipped after the 1st of January. We believe that, while there are a great many complications and numerous adjustments to be made, Doctor Wiley is going to take the position that the manufacturers of the country as a rule are honest and upright citizens. He said, in his interview with the manufacturers and proprietors of medicinal agents, that the execution of the law rested more in their hands than in the judicial de-

partments, and he hoped that the regulations would be so planned that there will never be cause for prosecution, and that the district attorney will never be called upon to press a suit.

Certainly if Doctor Wiley takes that position, as we believe he does, honestly and squarely, he will give, as the representative of the United States official, a fair and liberal treatment to those concerned in this great question.

It is evident that the principle which shall govern the department in Washington is that every article must bear a label which tells the truth, and if manufacturers put upon the market, knowingly and wilfully, substances which differ from the standards, that difference must be clearly stated upon the label. If that principle is carried out it will be a great boon to the profession of pharmacy and medicine. It will have the immediate effect certainly of making it easier for the pharmacist and physician to obtain good and reliable material, and the ultimate effect will be to raise the standard and dignity of the profession of pharmacy. We are therefore thankful for the law as it is, although it may have, as is frequently the case with new laws, certain imperfections and shortcomings.